

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

YYZ, LLC, v.  HEWLETT-PACKARD COMPANY, Defendant.	Plaintiff,	C.A. No. 13-cv-136-SLR
YYZ, LLC, v.  ADOBE SYSTEMS, INC., Defendant.	Plaintiff,	C.A. No. 13-cv-579-SLR
YYZ, LLC, v.  PEGASYSTEMS, INC., Defendant.	Plaintiff,	C.A. No. 13-cv-581-SLR

**PLAINTIFF'S CROSS-MOTION FOR  
SUMMARY JUDGMENT THAT THE ASSERTED CLAIMS OF THE PATENTS-IN-SUIT  
ARE NOT INVALID UNDER 35 U.S.C. § 101**

Plaintiff YYZ, LLC (hereinafter, “YYZ”), through its undersigned counsel, hereby cross-moves for Summary Judgment that the asserted claims of the Patents-in-Suit are not invalid under 35 U.S.C. § 101, pursuant to Fed. R. Civ. P. 56. Whereas duly-issued patents are entitled to a presumption of validity under 35 U.S.C. § 282 and the Defendants in the above-styled cases, Hewlett-Packard Company (hereinafter, “H-P”), Adobe Systems, Inc. (hereinafter, “Adobe”), and Pegasystems, Inc. (hereinafter, “Pegasystems”) (collectively, “Defendants”) have not overcome that presumption by clear and convincing evidence, YYZ asks for an Order GRANTING its Cross-Motion. In support, YYZ provides “YYZ’s Brief In Support Of Its

Opposition To Defendants' Motion For Summary Judgment That The Asserted Claims Of The Patents-In-Suit Are Invalid Under 35 U.S.C. § 101 And Cross-Motion For Summary Judgment That The Claims Are Not Invalid Under 35 U.S.C. § 101" and the Declaration of Jonathan R. Miller in support and the Exhibits attached thereto, filed concurrently herewith.

Date: February 27, 2015

Respectfully submitted,

**FARNAN LLP**

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